

REMARKS

Claims 1-86 are pending in the above-identified application, of which claims 28-76 are withdrawn from consideration. Claims 1-27 and 77-86 were rejected.

35 U.S.C. § 103 Obviousness Rejection of Claims

Claims 1-10, 12-22, 24-27 and 77-86 were rejected under 35 U.S.C. § 103(a) as being unpatentable over *Britton* (U.S. Patent No. 6,591,289) in view of *Harrington* (U.S. Patent No. 6,775,820). Claims 11 and 23 were rejected under 35 U.S.C. 103(a) as being unpatentable over *Britton* in view of *Harrington* and further in view of *Bickmore et al.* (U.S. Patent No. 6,857,102). Applicants respectfully traverse these rejections.

Claim 1 recites "a memory for storing at least the script extracted from the receiving data, the memory being located on a server configured to receive and send data to a client; and computer-readable code for substituting a script calling portion in the document with a portion for calling the script stored in said memory."

In the office action, the Examiner admits that *Britton* does not teach script substitution, but instead contends that *Harrington* discloses this limitation. Applicant respectfully disagrees. As Applicant has explained previously, *Harrington* does not teach "substituting a script calling portion in the document with a portion for calling the script stored in said memory." Instead, *Harrington* discloses that a script may be re-coded if it is not compatible with an operating system. Specifically, *Harrington* teaches that a web-based application using javascript can be re-coded in Visual Basic Script so that the application is compatible with a browser on an OS/2 operating system. Thus, *Harrington* merely teaches that one type of script may be replaced by another. After the re-coding process in *Harrington*, it is still the client that must execute the script.

Claim 1, however, recites "substituting a script calling portion in the document with a portion for calling the script stored in said memory." This presents a significant advantage from prior systems as the client in the present invention no longer needs to possess the means for executing the script, thus permitting the client design to be simplified and more cost-effective. This advantage is neither present nor even contemplated by *Harrington*.

Applicant also submits that the Examiner's contention in a prior office action that it would have been obvious to substitute the script with a call to script stored in a relay server rather than re-coding is not correct. Unlike the present invention which is directed to portable devices, *Harrington* is directed to OS/2 client. As an OS/2 environment contains the functionality for executing scripts, employing the present invention in the *Harrington* system would only serve to complicate and slow down the system by requiring the client to request script execution from a remote server, whereas in the present invention, substituting the script with a call to script stored in a relay server allows a for a portable client device to be streamlined by eliminating the functionality for executing the scripts.

Applicant also submits there is no motivation to combine *Britton* with *Harrington*. Obviousness can only be established by combining or modifying the teachings of the prior art to produce the claimed invention where there is some teaching, suggestion, or motivation to do so found either in the references themselves or in the knowledge generally available to one of ordinary skill in the art. MPEP Section. 2143.01 (emphasis added). Here, there is no such teaching, suggestion or motivation.

Britton teaches a method for delivering a formatted document over a communications network. Abstract. In *Britton*, a template file containing a programming script is provided to an information server. Abstract. Upon request from a user, the script is executed. More

particularly, *Britton* teaches that the "client computer submits a request for the document by selecting a hypertext link pointing to a scripted template file containing script commands for instruction the server computer during preparation and formatting of the requested document." Col. 3, lines 62-66. The purpose of this script is to properly format and arrange the requested information. As *Britton* explains, "[b]ecause the process of arranging the information in the document and of formatting the document into the portable document file format is driven by the scripted template file, the server computer is not required to run additional programs or components to perform these tasks." Col. 4, lines 8-13.

There would simply be no motivation to modify *Britton* with the teachings of *Harrington*. The script contained in the template file in *Britton* is intended to be executed by the information server and not by a client. By contrast, as discussed above, *Harrington* is directed to re-coding of a script to comply with an client's operating system. As the script in *Britton* is never intended to be executed by the client, there would be absolutely no reason to use the teachings of *Harrington* to re-code the script in *Britton*, and neither *Britton* nor *Harrington* provide any such motivation to do so. Accordingly, Applicant submits that claim 1 is allowable over the cited art. For the same reasons, Applicant submits that independent claims 6, 10, and 22 are also allowable.

For the foregoing reasons, Applicants submit that the application is in condition for allowance. Notice to that effect is requested.

Respectfully submitted,

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